



# Oregon

Theodore R. Kulongoski, Governor

## Department of Environmental Quality

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April 27, 2010

Mr. Steven Shinnars  
Sr. Mgr. Hazardous materials & Environmental Services  
YRC North American Transportation, Inc.  
10990 Roe Avenue  
Overland Park, KS 66211

**Re: Roadway Express**  
**ECSI #3807** Portland, Oregon  
No Further Action Determination

Dear Mr. Shinnars:

The Oregon Department of Environmental Quality (DEQ) has completed the public notice and comment period for the subject site and no comments were received on the proposed staff report recommending a No Further Action (NFA) determination. Therefore, DEQ concludes that the Roadway Express site located at 6845 N. Cutter Circle, Portland, Oregon is currently protective of public health and the environment and requires no further action under the Oregon Environmental Cleanup Law, ORS 465.200 et seq., unless new or previously undisclosed information becomes available. This determination is based on the regulations and facts as presented in the enclosed staff report. The Environmental Cleanup Site Information System (ECSI) database will be updated to reflect this decision.

DEQ recommends keeping a copy of all of the documentation associated with this remedial action with the permanent facility records.

If you have any questions about this letter, please contact Marcy Kirk at (541) 633-2009.

Sincerely,

Keith Johnson  
Environmental Cleanup Program Manager  
Northwest Region

Enclosure: Staff Report



State of Oregon  
Department of Environmental Quality

Memorandum

Date: April 5, 2010

To: Keith Johnson, Northwest Region Cleanup Manager

From: Marcy Kirk, Project Manager/Hydrogeologist

Subject: NFA Recommendation for the Roadway Express Site in Portland, Oregon; ECSI #3807

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**Introduction**

This document presents the basis for the Oregon Department of Environmental Quality's (DEQ's) recommended action for the Roadway Express site (Site) located at 6845 N. Cutter Circle, Portland, Oregon (Figure 1). This recommended action was selected in accordance with Oregon Revised Statutes (ORS) 465.200 through 465.455 and Oregon Administrative Rules (OAR) Chapter 340, Division 122, Sections 010 to 0140 and Sections 0320 to 0360.

The recommended action is based on information documented in Soil Matrix Cleanup, Roadway Express Facility (Report), dated December 2, 2005 by Grant Associates, Inc. This document summarizes the information contained in this Report. Site investigations were reviewed under a DEQ Independent Cleanup Pathway Agreement dated February 2, 2009.

**Background**

The Site is 24.21 acres in size and is located in Township 1 South, Range 1 East, Section 17, Map Tax Lot 1N1E17A - 00800; Multnomah County, Portland, Oregon. The Site is located in the Willamette Industrial District that is part of Swan Island. The Site is used as a warehouse and truck transportation facility. The portion of the Site that a NFA is requested for is located near the northeast corner of the property, as shown in Figures 1 and 2.

During an inspection of the facility by DEQ's Hazardous Waste Program on September 16 and 19, 2005, petroleum stained soil was observed by the used oil drum storage area, located on the approximate north property boundary adjacent to a maintenance area at the facility. DEQ advised Roadway Express to oversee a cleanup response. Thermo Fluids Inc., under contract to Roadway Express, performed a soil removal action in November 2005.

**Nature and Extent of Contamination**

The release of petroleum hydrocarbons was evidently caused by material handling practices of liquid petroleum products and used oil in an uncovered area. Rainwater mobilized petroleum residues on the 55 gallon containers, depositing the petroleum on the ground surface.

One sample of obviously stained soil was collected on October 11, 2005 and analyzed for total petroleum hydrocarbons (TPH) - Hydrocarbon Identification (HCID). Analytical results identified a concentration of 24,300 milligrams per kilogram (mg/kg) oil range hydrocarbons. Although not discussed in the Report, another soil sample was collected on September 20, 2005

and analyzed for Toxic Characteristic Leaching Procedure (TCLP) metals and a limited set of volatile organic compounds. These analytes were not detected above reporting limits.

#### **Removal Actions**

Approximately 15.72 tons of petroleum contaminated soil was excavated and transported to USA Waste Management's Hillsboro Landfill. The final dimensions of the cleanup excavation were approximately 7 feet long by 5 feet wide by 5 feet deep. Soil materials encountered in the excavation consisted of up to three feet of sandy gravel structural fill material, and then poorly graded sand to five feet below ground surface.

Four confirmation soil samples were collected from the floor and sidewalls of the excavation on October 31, 2005. The soil samples were analyzed for gasoline and diesel-range hydrocarbons by Texas Natural Resource Conservation Commission (TNRCC) 1005. This analytical method is analogous to Northwest TPH (NWTPH). Petroleum hydrocarbons were not detected above the method detection limit of 50 mg/kg.

Groundwater was not encountered in the excavation. The excavation was backfilled with imported materials.

#### **Soil Matrix Cleanup Evaluation**

Technically, according to OARs, only leaking underground storage tank sites can be closed under the Soil Matrix Cleanup rules (OAR 340-122-0320- through 340-122-0360). However, the soil matrix cleanup levels are considered adequately protective for petroleum contamination regardless of source. As groundwater was not encountered during the removal action and confirmation soil samples did not detect TPH, closure under the Soil Matrix Cleanup rules will be allowed for this Site. Analytical results indicate that petroleum impacted soil was removed to below the most stringent Soil Matrix Cleanup Level 1 of 100 mg/kg diesel TPH, thus the Site is deemed protective of human health and the environment.

#### **DEQ Recommendation**

Based on the results of the investigations conducted to date, DEQ recommends a No Further Action determination for the Roadway Express Site in Portland, Oregon. A 30-day Public Notice and Comment was provided in the Secretary of State Bulletin and in the Oregonian newspaper on March 1, 2010. No comments were received during the comment period. Therefore, DEQ makes a No Further Action determination based on the available data for the site.



